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July 17, 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W. -- Room 222
Washington, D.C. 20554

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Re: RM 8658 -- HEAR-IT-NOW
Petition for Rulemaking

Dear Mr. Caton:

DOCKET FILE COPY ORIGINAL

On behalf of **Nokia Mobile Phones, Inc.**, enclosed is an original and six copies of its "Comments Opposing Institution of a Rulemaking Proceeding".

Sincerely,

Tom A. Lippo
FACT/Washington

TAL/GFid
Enclosures (6)

No. of Copies rec'd
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Section 68.4(a) of the)
Commission's Rules --)
Hearing Aid Compatible)
Telephones)
)
Petition for Rulemaking)
submitted by HEAR-IT-NOW)
_____)

RM No. 8658

DOCKET FILE COPY ORIGINAL

**COMMENTS OF NOKIA MOBILE PHONES, INC.
OPPOSING INSTITUTION OF A
RULEMAKING PROCEEDING**

Nokia Mobile Phones, Inc., ("Nokia")¹, by and through its undersigned counsel, hereby submits these comments to the Petition filed by HEAR-IT-NOW seeking institution of a rulemaking proceeding.

Nokia opposes the institution of a rulemaking as proposed by HEAR-IT-NOW and strongly supports the position of the wireless communication industry opposing such rulemaking, as set forth in the filings by the industry trade associations and others.

¹Nokia is engaged in the manufacture and sale of cellular telephone equipment in Texas and Florida, as well as in its nationwide distribution. Nokia Mobile Phones, Inc. is a wholly owned subsidiary of the Finnish company Nokia Mobile Phones Oy, currently the second largest manufacturer of cellular telephone equipment in the United States and the world. The Nokia companies are the largest suppliers of cellular telephone equipment in the European market, including GSM-based digital technology.

Compatibility between wireless communication devices (including PCS) and other electronic equipment (including hearing aids) is currently being ensured by unprecedented cooperative efforts across the communications, medical and electronic equipment fields. Their common goal is to ensure rapid, safe deployment of new technology to improve the lives of all Americans, including those who are challenged by hearing disabilities or other impairments.

This cooperative cross-industry effort is precisely the type of activity which the Commission has encouraged in many similar contexts. Private industry is policing itself, under the Commission's informal scrutiny, thereby encouraging rapid and concrete activity by all concerned.²

The alternative proposed by the HEAR-IT-NOW petition is for the Commission to interrupt this process, and instead to institute rulemaking on a single technology's alleged interference with a single medical device.

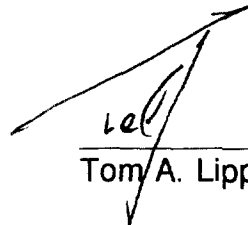
If such an approach is adopted, logic and fairness will require simultaneous parallel proceedings for each and every type of RF compatibility issue, and will require extensive unnecessary and duplicative efforts by the industry and the Commission.

² As the Commission recognizes, formal rulemaking all too often has the practical effect of inhibiting such voluntary activity while parties understandably hesitate or wait for the outcome of a rulemaking proceeding.

Such resources are far better spent on ensuring the continuation of the process already now well underway, in order to achieve electromagnetic compatibility of all technologies by cooperative cross-industry efforts. Therefore, Nokia urges the Commission to deny HEAR-IT-NOW's petition for rulemaking.

July 17, 1995

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Lippo', is written over a horizontal line.

Tom A. Lippo, Esq.

Counsel for
Nokia Mobile Phones, Inc.

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)	
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submitted by HEAR-IT-NOW)	
_____)	

CERTIFICATE OF SERVICE

I, Carroll Hauptle, Esq., hereby certify that on this 17th day of July, 1995, copies of the foregoing Comments of **Nokia Mobile Phones, Inc.** were served by hand delivery upon the following parties:

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W. -- Room 222
Washington, D.C. 20554

International Transcript Service
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